

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: JUUL LABS, INC.,
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION,

Case No. 19-md-02913-WHO

**JOINT STIPULATION AND [PROPOSED]
ORDER REGARDING EXTENSION OF
TIME FOR FILING JOINT SUBMISSION
ADDRESSING ADMINISTRATIVE
MOTIONS TO SEAL FILED IN
CONNECTION WITH MOTIONS FOR
SUMMARY JUDGMENT, MOTIONS IN
LIMINE, & MOTIONS RE *SFUSD* TRIAL**

This Document Relates to:

ALL ACTIONS

The undersigned parties jointly stipulate and agree, subject to the Court's approval, to a thirty (30) day extension of the deadline for the parties to submit a joint chart addressing all material covered by the administration motions identified by this Court in its September 13, 2024 Order Regarding Administrative Motions To Seal Filed In Connection With Motions For Summary Judgment, Motions In Limine, & Motions Re *SFUSD* Trial (ECF No. 4299). In support thereof, the parties state as follows:

WHEREAS, on September 13, 2024, the Court entered an order identifying 58 administrative motions to seal files in connection with the *San Francisco Unified School District* bellwether case and trial and ordered the parties to submit, within 20 days of entry of the Order¹, a joint chart identifying the documents – by docket number and exhibit – that contains information not publicly disclosed during the *SFUSD* trial that continue to meet the compelling justification standard for sealing and which documents may be unsealed (ECF No. 4299);

WHEREAS, the Parties have been diligently working to review each motion and related documents filed under seal, review the *SFUSD* trial transcript for the documents' disclosure, and identify whether the documents continue to require sealing for compelling justification;

¹ Twenty days from entry of the Court's September 13, 2024, sets forth a deadline of October 3, 2024.

1 WHEREAS, the Parties believe additional time is required to ensure each document is
2 properly reviewed and analyzed for confidentiality considerations and they believe that extending
3 the deadline to November 4, 2024², would provide time for more thorough analysis for the Court's
4 subsequent consideration;

5 WHEREAS, the above referenced modifications would not otherwise impact this Court's
6 administration of the Multi-District Litigation, which remains active;

7 NOW THEREFORE, the parties, through their undersigned counsel, hereby jointly
8 stipulate, agree and respectfully request that the Court enter an Order setting the deadline for
9 parties' joint chart submission regarding administration motions filed in connection with motions
10 for summary judgment, motions in limine, & motions regarding the *SFUSD* trial to November 4,
11 2024.

12 RESPECTFULLY SUBMITTED this 30th day of September 2024.
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27 ² The Parties note that thirty (30) days following October 3, 2024 falls on a Saturday—November
28 2, 2024,—and therefore submit an extension deadline for the first business day following
November 2, 2024.

1 By: /s/ Timothy S. Danninger
2 Timothy S. Danninger (*pro hac vice*)
3 **GUNSTER YOAKLEY & STEWART,**
4 **P.A.**
1 Independent Drive, Suite 2300
Jacksonville, 32204
Telephone: (904) 354-1980

5 *Attorneys for Defendant Juul Labs, Inc.*

6 By: /s/ David E. Kouba
7 David E. Kouba, (*pro hac vice*)
8 **ARNOLD & PORTER KAY SCHOLER,**
9 **LLP**
601 Massachusetts Ave, NW
Washington, DC 20001
Tel: (202) 942-5230
Fax: (202) 942-5999
10 david.kouba@arnoldporter.com

11 *Attorneys for Defendants Altria Group, Inc.,*
12 *Philip Morris USA Inc., Altria Client Services*
LLC, and Altria Distribution Company

13 By: /s/ Eugene Illovsky
14 Eugene Illovsky
Kevin Calia
15 **ILLOVSKY GATES & CALIA LLP**
16 1611 Telegraph Ave., Suite 806
Oakland, CA 94612
Telephone: (415) 500-6643

17 *Attorneys for Defendant Adam Bowen*

18 By: /s/ Michael J. Guzman
19 **KELLOGG, HANSEN, TODD, FIGEL &**
20 **FREDERICK, P.L.L.C.**
Mark C. Hansen
Michael J. Guzman
David L. Schwarz
21 Sumner Square, 1615 M St., N.W., Suite 400
Washington, DC 20036
22 Telephone: (202) 326-7910

23 *Attorneys for Defendants Nicholas Pritzker,*
24 *Riaz Valani, and Hoyoung Huh*

By: /s/ Sarah R. London
Sarah R. London
LIEFF CABRASER HEIMANN &
BERNSTEIN
275 Battery Street, Fl. 29
San Francisco, CA 94111
Telephone: (415) 956-1000

By: /s/ Dena C. Sharp
Dena C. Sharp
GIRARD SHARP LLP
601 California St., Suite 1400
San Francisco, CA 94108
Telephone: (415) 981-4800

By: /s/ Dean Kawamoto
Dean Kawamoto
KELLER ROHRBACK L.L.P.
1201 Third Ave., Ste. 3200
Seattle, WA 98101
Telephone: (206) 623-1900

By: /s/ Ellen Relkin
Ellen Relkin
WEITZ & LUXENBERG
700 Broadway
New York, NY 10003
Telephone: (212) 558-5500

Co-Lead Counsel for Plaintiffs

By: /s/ James Kramer
James Kramer
Catherine Malone
Kevin Askew
ORRICK HERRINGTON & SUTCLIFFE
LLP
The Orrick Building
405 Howard Street
San Francisco, CA 94105-2669
Telephone: (415) 773-5700
jkramer@orrick.com
cmalone@orrick.com
kaskew@orrick.com

Attorneys for Defendant James Monsees

PROPOSED ORDER

**PURSUANT TO STIPULATION AND GOOD CAUSE SHOWING, IT IS HEREBY
ORDERED:**

The deadline for joint chart submission regarding administration motions filed in connection with motions for summary judgment, motions in limine, & motions regarding the *SFUSD* trial that is currently due on October 3, 2024 shall be extended to November 4, 2024.

Date: _____, 2024

HONORABLE WILLIAM H. ORRICK
United States District Judge